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RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 8, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, DC 20554

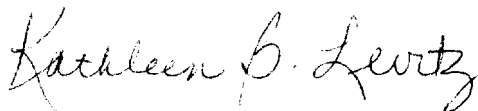
Re: CC Docket No. 99-200

Dear Ms. Salas:

On March 8, 2000, Randy Sanders and I, both representing BellSouth, met with Sarah Whitesell, Legal Advisor to Commissioner Tristani. The purpose of our meeting was to discuss what roles of the FCC, the states and industry guidelines should play in optimizing number resources used in the provision of telecommunications services and to discuss issues of particular concern to BellSouth Cellular Corp. The attached documents provided the basis for that discussion.

As required by Section 1.1206(b)(2) of the Commission's rules, I am filing two copies of this notice and ask that you place this notification in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachments

cc: Sarah Whitesell (w/o attachments)

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List ABCDE

Number Resource Optimization

BellSouth Telecommunications
CC Docket 95-200

Agenda...

- FCC Role
- Role of States
- Role of States in Number Optimization

Needed FCC Direction in Number Optimization...

- INC's 1K Pooling Guidelines
 - Service providers must be able to handle pooling
 - Guidelines show how to handle pooling will work
- Cost Reduction
 - Pooling costs are not state specific
 - Pooling is number administration
 - Pooling benefits all carriers, including non pooling carriers

Pooling Trials After 1st Qtr/2000 Should Use NPAC 3.0 Software

• Carriers should implement pooling using the national standard.

• Carriers using NPAC 2.0/1.4 software will not significantly extend

• Carriers should implement pooling using the national standard.

Industry Numbering Committee Guidelines...

- Industry Developed Guidelines Were Developed in an Open Forum By Numbering Experts
 - Provide parameters for uniform implementation of pooling
 - Provide a method to measure benefits of pooling
 - Guidelines can be modified as needed
- Industry Developed Guidelines Were Developed in an Open Forum By Numbering Experts
 - Ad Hoc changes by states to guidelines does not allow proper evaluation of change
 - States can and should attend INC meetings to propose changes
- States Lose Authority By Proposing Changes to Industry Developed Guidelines Without Industry Input

...and the fact that the states to "conduct ... pooling trials in ... thousands-block pooling guide...

Number Pooling Implementation

- Must Use Incentive-Based Approach to Meet National Standards
- Should Use a Phased-In Approach
 - New transmission capacity should not be allowed after 1st/Qtr 2000
- Should Not Be Implemented in NPAs That Will Exhaust in Less Than 12 Months
- Must Use a Phased-In Approach

A Uniform Set of Rules Applying States Within the Same NPAC Region Must Be Adopted and Implemented

Resolution to Cost Recovery

Role of States in Number Optimization...

- States Have a Critical Role to Play in NPA Relief But...
 - States Must Be Open to New Ideas
 - Congress is currently working on a bill dealing with NPA Relief
 - States Must Examine Revenue Neutral Rate Center Consolidation
- Must Not Abdicate Their Obligation to Perform Timely NPA Relief
 - Rationing of Codes to Extend the Life of NPAs is not Optimization
- States Should Work With the Industry To Modify Guidelines
 - No Guidelines exist but Existing 1k Guidelines Need Modification
- States Should Encourage NPA
 - Encourage NPA by Encouraging NXX Codes

Blueprint for True Number Optimization...

- Service Providers Should Be Required To Submit To Random Audits To Ensure Compliance
- The Commission Should Mandate That NPA's Recognized By The NANC / NRO Be Used
- The Commission Should Work With State Commissions To Establish A Transition Plan To Mandatory Ten-Digit (10-D) Dialing
 - The Commission should encourage all carriers to allow 10-D "permissive"
 - The Commission should mandate 10-D dialing for all interstate calls
 - Mandatory 10-D dialing should be imposed whenever an NPA goes into service
- The FCC Should Encourage All States Should Adopt NPA Overlays as the Preferred Choice
- Any NPA Overlay Should Be Implemented In A Phased Manner

Numbering Resource Optimization

CC Docket No. 99-200

Ex Parte Presentation
BellSouth Cellular Corp
March 8, 2000

Overview

- *Commission's logic in LNP extension for wireless is still sound*
- *Wireless pooling prior to LNP is impractical and inappropriate*
- *A utilization threshold solution, in the event they are mandated by the Commission*
- *Strong national guidelines are needed for consistency and competitive neutrality*

Wireless LNP

➤ *Commission's logic in LNP extension for wireless is still sound*

- PCS network build outs are still underway
- To support nationwide roaming, significant roaming challenges must be addressed
- Given human and capital resource constraints, the Wireless Number Portability Timeline for Phase 2 is ambitious yet realistic
- BellSouth is diligently working on compliance with the FCC mandate to implement LNP
- November 24, 2002 is the earliest practical date for wireless LNP

Wireless Pooling

- *Wireless pooling prior to LNP is impractical and inappropriate*
 - Wireless carriers efficiently use NXXs over multiple rate centers so that pooling for wireless is unnecessary
 - Pooling before LNP is technically impossible because pooling uses the LNP architecture
 - Significant problems exist with donation of numbers prior to pooling
 - WNPSC investigation concluded that pooling before porting is not a viable approach for wireless
 - Consuming resources to implement interim pooling would jeopardize compliance with the LNP implementation deadline

Wireless Utilization

➤ *A utilization threshold solution, in the event they are mandated by the Commission*

- There are many factors which influence how wireless carriers utilize numbers
- The code request procedure, using months to exhaust as described in the current C.O. Code Assignment Guidelines, is the appropriate vehicle to manage utilization
- BellSouth proposes a utilization threshold solution based on rate centers, using a phased-in threshold, and offering a solution to the “end-run” problem
- Utilization by NPA is only appropriate for monitoring purposes

BellSouth's Wireless Utilization Threshold Solution

- Carriers who pool should not be required to use utilization thresholds
- Carriers may choose to continue using utilization thresholds in lieu of pooling
- Utilization should be calculated based on wireline rate centers
- Calculations should follow CO Code Assignment Guideline conventions for the various number category definitions
- The utilization should be calculated at the time a code is requested
- There should be two tracks for obtaining new codes from NANPA
 - A "High utilization track" – applies whenever carrier meets or exceeds utilization threshold in rate center. Thresholds are
 - 55% - effective with NRO Order
 - 60% - effective one year later
 - 65% - effective two years later
 - Only one rate center in a wireline local calling area may contain "virtual" NXX codes. "Virtual" NXXs are codes that exist in a rate center without the physical presence of a mobile switch. (Existing virtual codes should be grandfathered.)
 - NANPA must grant or deny code request within ten business days from receipt
 - A "Low utilization track" – applies whenever carrier cannot meet utilization threshold, but carrier still has a legitimate and reasonable need for numbers in a rate center. Consists of
 - Demand showing - showing of need for numbers with sufficient data for NANPA to verify whether demand is justified
 - Capacity showing - showing of reasons existing numbers cannot be used to satisfy demand with sufficient data for NANPA to justify
 - NANPA must provide code or denial reasons within 10 business days from receipt

National Numbering Guidelines

➤ *Strong national guidelines are needed for consistency and competitive neutrality*

- The FCC must establish and enforce national guidelines
- The FCC must clearly define state authority over numbering
- State-by state implementation of pooling is inconsistent with inter-state nature of NPAC and operational conventions of wireline and wireless carriers
- Numbering Authority over and above that already granted by the FCC in addressing the individual state petitions is inappropriate

